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***March 25, 2014***

6 Attorney for Debtors  
7 ANTHONY THOMAS and WENDI  
THOMAS and AT EMERALD, LLC  
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9 UNITED STATES BANKRUPTCY COURT  
10 DISTRICT OF NEVADA

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12 In Re: Case No. BK-N-14-50333-BTB  
Case No. BK-N-14-50331-BTB  
13 ANTHONY THOMAS and  
WENDI THOMAS, Chapter 11 Cases  
14 [Joint Administration - PENDING]  
15 AT EMERALD, LLC,  
16 **MOTION FOR JOINT**  
**ADMINISTRATION**  
17 Hearing Date: May 7, 2014  
Hearing Time: 10:00 a.m.  
18 Debtors, /

19 ANTHONY THOMAS and WENDI THOMAS and AT EMERALD, LLC, Debtors  
20 above-captioned and hereinafter collectively referred to as “Thomas-AT Emerald,” by and  
21 through their undersigned counsel, Holly E. Estes, Esq., of the Law Offices of Alan R. Smith,  
22 hereby file this Motion for Joint Administration (the “Motion”) of the pending Chapter 11  
23 cases. This Motion is made and based upon the Points and Authorities set forth below, 11  
24 U.S.C. § 105(a), Federal Rule of Bankruptcy Procedure 1015(b), the pleadings and papers  
25 on file herein, and such other matters as may be presented at the hearing hereon.

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**POINTS AND AUTHORITIES**

**A. Statement Of Facts**

Anthony Thomas and Wendi Thomas filed their voluntary petition under Chapter 11 of the United States Bankruptcy Code on March 4, 2014 (Case No. 14-50333). AT Emerald, LLC, filed its voluntary petition under Chapter 11 of the United States Bankruptcy Code on March 4, 2014 (Case No. 14-50331). No trustee has been appointed and Debtors are currently operating as debtors-in-possession.

Grounds for this Motion are predicated on the following:

(1) Anthony Thomas is the sole member of AT Emerald, LLC.

(2) The business records and financial and accounting data of AT Emerald, LLC, are maintained by Anthony Thomas.

(3) The Thomas-AT Emerald cases are both pending before this Court. Joint administration of the cases, including the combining of notices to creditors of the two estates and the handling of other purely administrative matters, will prevent the imposition of unnecessary costs on the estates and duplicate proceedings before the Court.

(4) Joint administration is appropriate because it will result in expediting the cases and rendering the process less costly, a benefit to both Thomas-AT Emerald and their creditors.

**B. Legal Basis For The Relief Requested**

(a) Joint Administration

Federal Rule of Bankruptcy Procedure 1015(b) permits the court to order joint administration of cases pending against related entities. These include:

(1) a husband and wife, or (2) a partnership and one or more of its general partners, or (3) two or more general partners, or (4) a debtor and an affiliate, the court may order a joint administration of the estates. . . .

As to the two Chapter 11 cases seeking joint administration by this motion, the business and financial affairs of the two Debtors are significantly intertwined to make joint administration more efficient and economical than separate administrations. The business operations work hand-in-hand with each other, as the individual Debtor, Anthony Thomas,

1 manages and operates the Nevada limited liability company.

2 Joint administration is proper under the circumstances, and will provide for a more  
3 effective and efficient administration of the Chapter 11 cases of Thomas-AT Emerald. There  
4 is no prejudice to creditors or conflict of interest. The substantive rights of creditors or  
5 parties in interest will not be affected by an order of joint administration. Joint  
6 administration will avoid unnecessary costs and delay and is in the best interest of creditors  
7 and the estates. In re McKenzie Energy Corp., 228 B.R. 854 (Bankr. S.D. Tex. 1998) (joint  
8 administration saved costs and any potential conflict of interest was only speculative).

9 WHEREFORE, Thomas-AT Emerald requests an order directing the joint  
10 administration of these Chapter 11 cases including:

- 11 1. Combining the estates by using a single docket [the “lead” case of Anthony  
12 Thomas and Wendi Thomas, Case No. 14-50333], for administrative matters, and the filing,  
13 lodging and docketing of pleadings and orders;
- 14 2. The combining of notices to creditors and parties in interest, using a combined  
15 creditor matrix for the two Debtor cases;
- 16 3. The scheduling of hearings;
- 17 4. The joint handling of other administrative matters;
- 18 5. Such other relief as is just and proper.

19 DATED this 24<sup>th</sup> day of March, 2014.

20 LAW OFFICES OF ALAN R. SMITH

21 By: /s/ Holly E. Estes  
22 HOLLY E. ESTES, ESQ.  
23 Attorney for Debtors  
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